

A decorative graphic on the left side of the slide. It consists of a vertical black line intersecting a horizontal black line. To the left of the intersection, there are three overlapping squares: a blue one at the top, a red one in the middle, and a yellow one at the bottom.

The Revision of Q-37

Reducing the pest risk associated
with the importation of plants for
planting



Plants for Planting

- Code of Federal Regulations (CFR) 319.37 is the principal regulation governing the import of plants for planting
- Other related regulations also covered in the revision
 - 319.15 Sugarcane
 - 319.19 Citrus & related genera
 - 319.24 & .41 Corn & related genera
 - 319.55 Rice
 - 319.59 Wheat



Risks Associated with the Importation of Plants for Planting

- Difficult to establish origin
- Difficult to inspect at ports of entry
- Many pests borne internally
- Introduced pests likely to become established
- Production facilities moving off shore to remain competitive
 - – examples: geranium, tropical foliage, poinsettia
- Inadequate information on pests that may have quarantine significance
 - Distribution of known quarantine pests
 - Pests of unknown quarantine significance



The Results: Pests that could have entered with plants for planting

- Plum pox potyvirus
 - Sudden oak death
 - Longhorn beetles, cedar, citrus, Asian
 - Emerald ash borer
 - Red gum lerp psyllid
 - Eucalyptus pitch canker
 - Hemlock wooly adelgid
 - Pink hibiscus mealybug
 - *Ralstonia solanacearum* race 3, biovar 2
- Corn cyst nematode
 - Karnal bunt
 - Dogwood anthracnose
 - Daly lily rust
 - Citrus Canker
 - Devil's tearthumb
 - Japanese knotweed
 - Tropical Soda apple



Basic Premise of Q-37

- Majority of plant taxa are enterable with only a port of entry inspection.
- Some plants for planting are further restricted by additional requirements
- Pest risk analysis required only for certain types of importations

Comparison of Q-37 Original Intent vs Current Practice

Early Years

Now

Trading Partners	Europe	Worldwide
# of Items Allowed Import	Limited (< 100 items) germplasm of clonal material only	Unlimited
Fumigation	Mandatory on all Imported Stock	Only When Quarantine Pest Found
Likely Purpose of Importation	Nursery propagation program “starter” material Slow distribution	Direct field/homeowner planting Immediate distribution



Comparison of Import Requirements Q-56 and Q-37

	Q-56	Q-37
Enterability	Only specific taxa/country combinations	All taxa except specifically prohibited
Risk assessment & mitigation	Required before importation	Only plants in growing media
Monitor and audit mitigation	Usual	Seldom
Genera imported	@200	Several Thousand
Origin of import	Part of PRA	Difficult to detect



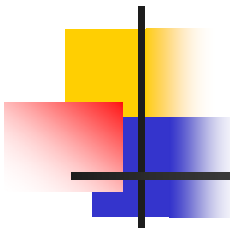
Comparison of Pest Risk Q-56 and Q-37

	Q-56	Q-37
Product as source	Days to Weeks	Months to Years
Risk reduction	PRA, mitigation measures, visual inspection	Visual inspection at port
Suitable host/ Environment for establishment	Less likely	More likely



Types of Change

- Operational – Improve the way we do business
- Regulatory – Complex, multiple changes expected, minimize impact, maximize reduction in pest risk
- Stakeholder – Resistance, transparency, acceptance



Q-37 – Revision

Principal Activities

- **Project Design:**

- Policy initiatives and implementation strategies to review, revise, and monitor new program and the change process.

- **Rule-making initiatives:**

- Facilitate regulatory changes to decrease pest risk and meet international obligations, safeguarding recommendations, and the Plant Protection Act.

- **Accreditation/Certification Programs:**

- Implement creative methods to protect against plant pests while facilitating international trade.

Q-37 - Revision

Principal Activities (cont)

- **Plant Import Data Compilation:**

- Assess plant taxa being imported; including their volume, origins, and potential impacts.

- **Pest Risk Determination Systems:**

- Pest risk criteria, ranking, evaluation, and assessment.

- **Operational Actions:**

- Plan and implement needed operational changes, resources and other needs.

- **Outreach/Coordination:**

- Stakeholder collaboration, public meetings/outreach, and coordination.



Revising Q-37:

Highlights of the 1st ANPR

- Programs to reduce risk of entry and establishment
- Establish a new import entry category
- Improve data collection to determine taxa imported, origin, and volume
- Develop rapid pest risk evaluation methodology
- Reevaluate taxa currently prohibited
- Incorporate all plants for planting into one regulation



Revising Q-37:

Highlights of the 1st ANPR (cont)

- Programs to reduce risk of entry and establishment
 - Accredited programs
 - Clean stock for foreign exporters
 - Best practices for importers



Elements of an Accredited Clean Stock Program

- Incentive for grower participation
- NPPO set standard, provide review, approval and oversight
- Accredited grower pest management program (e.g., best practices, ISO)
 - (including pest free propagation material)
- US review and approval
- NPPO and US monitor and audit production and shipments
- Penalties and remedial action for non-compliance

Revising Q-37:

Highlights of the 1st ANPR (cont)

- Establish a new import entry category
(Plant taxa would be 'excluded pending risk evaluation and approval' – Q-56 model)
 - Two approaches possible
 - All taxa that have not already entered the US
 - Only for taxa where reasonable indication of pathway for invasive pest or is invasive pest
 - Criteria science-based but less stringent than PRA

Revising Q-37:

Highlights of the 1st ANPR (cont)

- Improve data collection to determine taxa imported, origin, and volume
 - No one source for data
 - Resources needed for input, maintenance, & analysis
 - Support regulation change, grandfathering taxa
- Develop rapid pest risk evaluation methodology
 - Accurate, efficient, timely
 - High output, large number already needed
 - Include weediness screen

Revising Q-37:

Highlights of the 1st ANPR (cont)

- Reevaluate taxa currently prohibited
 - Not just Q-37, also Q-19, 41, 55, etc.
 - Listed pest widespread, new pest distribution
 - Need PRA to determine all pests of concern
- Incorporate all plants for planting into one regulation
 - Promote clarity, consistency, and transparency
 - Possibly include Noxious weeds